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SDN Users Association, Inc.

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OFFICE OF THE SECRETARY

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June 2, 1992

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street N.W.
Room 222
Washington, D.C. 20554

Re: Comments on CC Docket No. 92-77

Dear Ms. Searcy:

Please be advised that the following information references FCC Docket Number 92-77, "Billed Party Preference for 0+ InterLATA Calls," specifically Proprietary Calling Cards and 0+ Access.

These comments are intended to represent the position of the SDN (Software Defined Network) User's Association, Inc., an independent business association. As noted in our previous communications and visits to the Commission, our 317 member companies represent a cross-section of American Business -- petroleum, paper products, chemicals, metal fabrication, banking, securities, defense contractors, manufacturing, insurance, agriculture, transportation, etc. Our membership comprises a broad spectrum of diversified interests, domestically and internationally. Most of our members have implemented individual company calling cards which work in conjunction with their SDN.

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When commenting on FCC Docket 91-35, "Policies and Rules concerning Operator Service Access and Pay Telephone Compensation," the Association noted in part

The decision to purchase a product such as SDN (Software Defined Network) is based on numerous criteria ...[including] capability of issuing company calling cards which make use of the installed SDN to further reduce costs and simplify billing, payments and supplier management. The use of this "company card" is dependent upon the caller having the ability to reach AT&T as the carrier.

When a company decides to purchase and install SDN, it is part of an overall business plan. The intent of the product is to provide a high grade of service at a competitive cost, while providing users ease of operation from coast to coast. The inability to use a company calling card because of no access to the appropriate carrier creates frustration and chaos for the traveler, interruption in conducting business and the increased possibility that competitive rates are lost. It is our organization's opinion that this was not one of the objectives of the Modified Final Judgement (MFJ).

From this position on Docket 91-35 follows the Association's position on Docket 92-77 that calling card calls should be routed to the customer's IXC of choice (in this case AT&T) which issued the calling card. It further follows that there is no need for AT&T to share their proprietary validation and billing database with other IXC's. In fact, for the database to be shared is detrimental to the customer.

AT CUSTOMERS' REQUEST, AT&T has invested a great deal of time and money in the development of a system that precludes sharing of data with other carriers. When validation and billing are shared among vendors, there is no guarantee which carrier will handle the call. One reason users insisted on the elimination of this feature in the first place was that on occasion calls were processed by IXC's that charged higher non-competitive rates than those available from AT&T.

Secondly, with the proprietary database, AT&T is able to monitor fraudulent calling card activity and to credit customers for fraudulent call charges under certain circumstances. If the validation and billing is shared with all carriers, not only will the risk of fraud increase, but the responsibility for fraud management will revert to the customer in all cases. This represents a cost in real dollars to the customer.

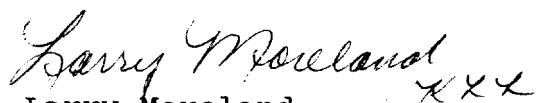
Thirdly, with the proprietary cards the customer is assured that calling card traffic will be included in SDN usage for calculation of discounts and for call pricing. A high volume of company calling card traffic may be used in calculation of annual usage requirements to determine discounted SDN rates. If the calls are serviced by another carrier, the customer could potentially incur penalties for not meeting the minimum requirements of their SDN agreements.

Mandating use of an access code or 800-number to reach a specific vendor to avoid the above three (3) problems is not in the best interests of the customer, either. If an access code or 800-number is required to assure calling card calls are billed at AT&T SDN rates, users lose the convenience of 0+ dialing. 0+ dialing convenience is demanded by calling card users, most of whom are very mobile people who require ease of use and are resistant to the retraining necessitated by such a dialing change. Some of our members report that the acceptance of AT&T SDN calling cards was, in fact, dependent upon the 0+ capability.

For the reasons cited above, it is our opinion that routing calling card calls through 0+ dialing to the IXC which the user chose specifically for that purpose is in the best interest of the customer. It is further in the customer's best interest that AT&T not be required to share their proprietary validation and billing database and that 0+ dialing be maintained.

If you have any questions or comments concerning this document please contact me at Caterpillar, Inc., 600 West Washington Street, AD341, East Peoria, Illinois 61630; telephone number (309) 675-2610.

Respectfully,


Larry Moreland
President
SDN Users Association, Inc.

cc: Cheryl Tritt, Chief, Common Carrier Bureau
Alfred C. Sikes, Chairman, FCC
Commissioner Andrew C. Barrett
Commissioner Ervin S. Duggan
Commissioner Sherrie P. Marshall
Commissioner James H. Quello